

HEC – Code of Conduct & Ethics

1. Scope and Applicability

The Code of Conduct & Ethics applies to all employees of Hellenic Environmental Center S.A. («HEC»).

It applies to all employees regardless of hierarchical level, as well as to new hires, who automatically and obligatorily adhere to its provisions. Compliance is mandatory for every employee.

The Code also applies to partners, suppliers, subcontractors and consultants representing or working on behalf of HEC, whether through outsourcing or other business activities.

2. Values & Principles

Credibility & Responsibility

We act responsibly in all areas of operation, including the Environment, Society, and Corporate Governance.

Sustainable Development & Innovation

HEC is committed to growth guided by environmental protection and societal well-being. Our R&D Department employs specialized personnel focused on sustainable development and innovation.

Integrity

- Towards stakeholders: transparency and accountability.
- Towards employees and partners: fostering a corporate philosophy of sustainable development.
- Avoidance of conflicts of interest: prioritizing HEC's interests over personal gain.

Efficiency & Commitment

We are dedicated to our values while meeting the expectations and needs of our stakeholders.

Dedication, Care & Respect

We respect the environment (reducing our ecological footprint) and society as a whole.

3. Business Ethics

Business ethics are essential for sustainable development. HEC condemns and avoids practices that distort fair competition or hinder economic and social development.

- Compliance with competition laws; no exploitation of market position.
- No offering or acceptance of undue payments.
- Fair competition based on the value of services.
- Adherence to anti-trust and competition regulations.

Employees' contribution builds a shared-value environment, enhancing organizational sustainability.

Anti-Bribery & Anti-Corruption

- Bribery, kickbacks, or facilitation payments are strictly prohibited.
 - Employees must comply with applicable anti-corruption laws.
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4. Avoidance of Conflicts of Interest

All employees, management, and partners act in the HEC's interest:

- **Relatives and Friends:** Avoid situations affecting judgment due to personal relationships.
 - **Activities of Relatives and Friends:** Ensure no conflicts from their activities.
 - **Outside Employment:** Secondary jobs must not hinder contributions.
 - **Corporate Opportunities:** Share opportunities and discoveries made at work.
 - **Gifts:** No inappropriate gifts, favors, or entertainment.
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5. Compliance with Laws and Regulations

HEC prioritizes compliance with all laws and regulations. Employees must adhere to the strictest applicable laws in any country of operation.

6. Privacy & Data Protection

HEC collects, stores, and processes information on employees, customers, and contacts.

Employees must:

- Collect data for legitimate purposes only.
 - Minimize data retention and store only as needed.
 - Comply with laws and internal policies.
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7. Whistleblowing

HEC encourages openness and integrity. Employees should report suspected misconduct to supervisors, managers, or anonymously if preferred. All reports are treated confidentially and investigated promptly.

8. Human Rights & Labor Standards

HEC respects human rights, promoting equality regardless of gender, ethnicity, religion, age, political opinion, or social status.

- No forced or child labor.
 - Zero tolerance for harassment.
 - Compliance with ILO standards: freedom of association, elimination of forced labor, abolition of child labor, and non-discrimination.
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9. Inclusion, Diversity & Equal Opportunities

HEC values diversity and inclusion, fostering creativity, innovation, and a discrimination-free environment supporting work-life flexibility and applying systems customized for employees with disabilities.

10. Management-Employee Relations & Human Capital

Employees are the key to success. HEC promotes mutual respect and cooperation via:

- Communication & Team Spirit
- Integrity
- Professional Behavior
- Health & Safety

Working conditions comply with national legislation, ILO conventions, ISO 45001, and SA 8000 standards. Employees are expected to:

- Act with integrity, honesty, and responsibility.
- Avoid conflicts of interest.
- Protect confidential information.
- Respect colleagues and cooperate.
- Adhere to health, safety, and attendance policies.

11. Supplier & Subcontractor Relations

Contracts are awarded to partners aligned with HEC's values. Compliance is monitored through evaluation processes. All stakeholders are treated fairly, without discrimination.

12. Onboarding & Training

New Employees: Must have required licenses, qualifications, occupational health clearance, and protective equipment.

Training: Employees receive comprehensive training, including mentorship by senior colleagues. Department heads assess readiness for independent work. Annual training programs address evolving needs.

13. Working Hours & Wages

- Working hours comply with legislation. Attendance and overtime are recorded and compensated.
 - Wages are paid monthly via bank transfer, meeting basic needs. Advance payments are allowed as agreed.
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14. Health & Safety

HEC ensures a safe workplace and prevents risks through:

- Protective equipment and training
- Regular health & safety measures
- First aid seminars and certifications
- Compliance with regulations

Employees must adhere to protocols and report hazards.

15. IT Security & Digital Conduct

Employees must:

- Use company IT systems responsibly and ethically.
 - Protect company data from unauthorized access or sharing.
 - Avoid misuse of email, social media, and digital platforms.
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16. Disciplinary Measures

Discipline is enforced progressively: verbal recommendation → written warning → final written notice → dismissal, only as a last resort. Dialogue and corrective actions are prioritized.

17. Management & Monitoring of the Code

Managers ensure awareness and compliance within their teams. Violations trigger corrective actions, monitored by the Compliance Department.

- Reporting mechanisms include direct supervisor, Compliance Department, or anonymous channels.
 - Records of incidents and resolutions are maintained to ensure accountability.
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18. Environmental & ESG Commitment

HEC commits to:

- Reducing environmental footprint through energy efficiency and waste reduction.
 - Promoting sustainable practices in operations and supply chain.
 - Annual reporting on ESG performance metrics.
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19. Sanctions Compliance

HEC is committed to complying with all applicable economic sanctions, trade restrictions and restrictive measures imposed by the United Nations, the European Union and other applicable authorities.

HEC shall not knowingly engage in or facilitate transactions or business relationships prohibited by applicable sanctions. Employees and business partners are expected to comply with applicable sanctions requirements and promptly report any suspected violation or attempt to circumvent such measures.

20. Related Policies

The Company maintains specific policies and procedures covering the matters addressed in this Code, which shall be complied with by all persons to whom they apply.